

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NORTHEASTERN DIVISION

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JASON RANDOLPH,

Plaintiff,

vs.

No. 2:06-cv-00058

No. 2:06-cv-00050

RONNIE DALE SCHUBERT;  
GARY GREEN;  
CHIEF OF POLICE DAVID E. BEATY; and  
THE CITY OF CROSSVILLE, TENNESSEE,

Defendants.

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**PLAINTIFF'S NOTICE OF FILING OF  
(1) BILL OF COSTS OF ANDREW C. CLARKE;  
(2) BILL OF COSTS OF STEPHEN A. BURROUGHS; AND  
(3) OBJECTIONS TO PLAINTIFF'S BILLS OF COSTS BY  
DEFENDANTS SCHUBERT AND GREEN**

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COMES NOW the Plaintiff, by and through counsel of record and pursuant to F.R.C.P. 54 and hereby provide Notice of Filing of the Bill of Costs of Andrew C. Clarke, the Bill of Costs of Stephen A. Burroughs and the Objections to Plaintiff's Bills of Costs served upon Plaintiff's counsel by Defendants Schubert and Green and would respectfully state as follows:

1. Plaintiff in the instant case is represented by Andrew C. Clarke of Borod & Kramer, P.C. and Stephen A. Burroughs of Burroughs & Johnson. On November 8, 2006, the Plaintiff, by and through his attorneys of record, accepted the Offer of Judgment made by all Defendants. On November 9, 2006, the Court filed an Order entering Judgment against the Defendants consistent with the Offer of Judgment.

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2. On November 15, 2006, Plaintiff's counsel served on counsel for the Defendants the Bill of Costs of Andrew C. Clarke and the Bill of Costs of Stephen A. Burroughs. Both the Bill of Costs of Andrew C. Clarke and the Bill of Costs of Stephen A. Burroughs itemize the expenses which the Plaintiff seeks reimbursement from the Defendants and attach supporting documentation. Further, both the Bill of Costs of Andrew C. Clarke and the Bill of Costs of Stephen A. Burroughs indicate that the Bills of Costs would be presented to the Clerk for taxation on November 27, 2006, at 12:00 p.m.

3. On November 21, 2006, Defendants Schubert and Green served Objections to Plaintiff's Bills of Costs on Plaintiff's counsel.

4. Consistent with the notice given in Bill of Costs of Andrew C. Clarke and the Bill of Costs of Stephen A. Burroughs, the Plaintiff provides notice that said Bills of Costs are being filed separately on November 27, 2006, at 12:00 p.m.. For completeness sake, the Plaintiff will also be filing separately the Objections to Plaintiff's Bill of Costs served upon the Plaintiff by Defendants Green and Schubert.

WHEREFORE, PREMISES CONSIDERED, the Plaintiff requests that the expenses listed in the Bill of Costs of Andrew C. Clarke and the Bill of Costs of Stephen A. Burroughs be taxed against the Defendants as costs of this action and added to the Judgment entered in this case on November 9, 2006, and for all such further relief, both general and specific, to which he may be entitled under the premises.

Respectfully Submitted,

BOROD & KRAMER, P.C.

s/ Andrew C. Clarke

Andrew C. Clarke (15409)  
Attorney for Plaintiffs  
80 Monroe Avenue, Suite G1  
Memphis, Tennessee 38103  
(901) 524-0200 (tel)  
(901) 543-0043 (fax)

BURROUGHS & JOHNSON

s/ Stephen A. Burroughs

Stephen A. Burroughs (19994)  
1750 Riverview Tower  
900 South Gay Street  
Knoxville, Tennessee 37902  
(865) 525-3773

#### CERTIFICATE OF SERVICE

I, Andrew C. Clarke, do hereby certify that a true and correct copy of the foregoing has been served upon the following persons through the Court's electronic filing system:

Daniel H. Rader, III  
P.O. Box 3347  
Cookeville, Tennessee 38502

Robert H. Watson, Jr.  
P.O. Box 131  
Knoxville, Tennessee 37901-0131

Stephen A. Burroughs  
1750 Riverview Tower  
900 South Gay Street  
Knoxville, Tennessee 37902

This the 27<sup>th</sup> day of November, 2006.

s/ Andrew C. Clarke

Andrew C. Clarke